

Mr. Jim Simpson  
Cargill, Inc.  
6640 Ship Drive, Port of Indiana  
Portage, Indiana 46368

Re: 127-15685  
2<sup>nd</sup> Administrative Amendment to  
FESOP No.: 127-11201-00025

Dear Mr. Simpson:

Cargill, Inc., located at Burns Waterway Harbor, Portage, Indiana 46368 was issued a FESOP on July 6, 2000 for a grain elevator. A letter requesting a change to this FESOP was received on March 7, 2002. The change in the FESOP qualifies as an administrative amendment, pursuant to the provisions of 326 IAC 2-8-10 which states "change to a monitoring, maintenance or record keeping requirement that is not environmentally significant". Therefore, the administrative amendment is as follows (changes are **bolded** and deletions are ~~struck through~~ for emphasis):

Request 1: The source requests the elimination of the stack testing requirements in Section D.4 for Baghouse #65, which is a closed loop system associated with the vessel/barge loading system (Peco Loading System). Additionally, vessels are seasonal and known to the source often times just days before arrival, making it difficult to schedule testing.

Response 1: This request has been referred to Compliance Data Section, the testing requirements on the Ship and Barge Loading cannot be deleted, because it is a federal requirement, under the New Source Performance Standards (NSPS) 40 CFR Part 60, Subpart DD. The source shall have to do the arrangement with the shipping company to make this NSPS testing requirements possible.

Request 2: The source is seeking clarification as to what emissions are to be measured and required testing in Section D.6.5 which pertains to the grain dryers. Particulate matter emissions are controlled by an internal cyclone system with filling and discharge equipment at the dryers controlled by Baghouse #62 which will be tested.

Response 2: The grain dryers were limited to 29,500,000 bushels of grain per 12-month period. 326 IAC 2-2, Prevention of Significant Deterioration (PSD) was the rule for the motivation of the limit. This limit corresponds to less than 25 tons per year of PM and was determined after the control (internal cyclone and filter bed) with an assumed control efficiency of 98%. Therefore, a verification of the 98% control efficiency through a stack test is required, and the corresponding operating parameters will be established and monitored for continuous demonstration of compliance with 326 IAC 2-2 and 40 CFR 52.21. Condition D.6.5 Testing Requirements will be clarified as follows:

D.6.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of ~~the this~~ **FESOP** permit, the Permittee shall perform testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for **the internal cyclone and filter bed PM to establish the pressure drop range that correspond to 98% control efficiency** and Method 9 for opacity, or other methods as approved by the Commissioner. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

APD

cc: File - Porter County  
U.S. EPA, Region V  
Porter County Health Department  
Northwest Regional Office  
Air Compliance Section Inspector - Rick Massoels  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
OFFICE OF AIR QUALITY**

**Cargill, Inc.  
Burns Waterway Harbor  
Portage, IN 46368**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 127-11201-00025	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: July 6, 2000
1 <sup>st</sup> Administrative Amendment No.: 127-15038, issued on November 27, 2001	
2 <sup>nd</sup> Administrative Amendment No.: 127-15685	Affected Page: 38
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 18, 2002

## SECTION D.6

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

Two (2) natural gas fired grain dryers, DR41 and DR43, each rated at 40 million BTU per hour, with particulate emissions controlled by an internal cyclone and filter bed rated at 98.0% efficiency.

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.6.1 326 IAC 12 (40 CFR 60.302, Subpart DD)

Pursuant to the New Source Performance Standards, 326 IAC 12 (40 CFR 60.300, Subpart DD) "Standards of Performance for Grain Elevators:"

(a) emissions from grain dryers shall be limited to 0% opacity.

#### D.6.2 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

This facility shall be limited to 29,500,000 bushels of grain dried per 12-month period, based on a monthly rolling total. This limit will establish compliance with Operation Permit 64-07-89-0188, by limiting particulate emissions below 25 tons per year. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements will not apply.

#### D.6.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the particulate matter emissions shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

For a process weight rate of 120 tons per hour, the equation states an emission limit of 53.1 pounds of particulate matter per hour.

#### D.6.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and control devices.

### Compliance Determination Requirements

#### D.6.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of the FESOP permit, the Permittee shall perform testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for the internal cyclone and filter bed PM to establish the pressure drop range that correspond to 98% control efficiency and Method 9 for opacity, or other methods as approved by the Commissioner. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

#### D.6.6 Control Device Required for Particulate Matter (PM)

The control device for PM control shall be in operation at all times when the facility is in operation.

#### D.6.7 Visible Emissions Notations

(a) Daily visible emission notations of the stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are "normal" or "abnormal."

